

1 Kevin S. Sinclair, Esq. (Nevada Bar No. 12277)  
ksinclair@earlysullivan.com

2 EARLY SULLIVAN WRIGHT  
3 GIZER & McRAE LLP  
4 601 South Seventh Street, 2nd Floor  
5 Las Vegas, NV 89101  
6 Telephone: (702) 331-7593  
7 Facsimile: (702) 331-1652

8 Attorneys for Defendant  
9 COMMONWEALTH LAND TITLE INSURANCE  
10 COMPANY

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 WELLS FARGO BANK, N.A.  
14 SUCCESSOR BY MERGER TO WELSS  
15 FARGO BANK MINNESOTA, N.A.,  
16 F/K/A NORWEST BANK MINNESOTA,  
17 N.A., SOLEY AS TRUSTEE FOR  
18 STRUCTURED ASSET MORTGAGE  
19 INVESTMENTS II INC. BEAR STEARNS  
20 MORTGAGE FUNDING TRUST 2007-  
21 AR1, MORTGAGE PASS-THROUGH  
22 CERTIFICATES, SERIES 2007-AR1,

23 Plaintiffs,

24 vs.

25 COMMONWEALTH LAND TITLE  
26 INSURANCE COMPANY,

27 Defendant.

Case No.: 2:18-cv-00494-APG-PAL

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
COMMONWEALTH LAND TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO COMPLAINT**

**(First Request)**



1 Plaintiff Wells Fargo Bank, N.A. Successor By Merger to Wells Fargo Bank Minnesota,  
2 N.A., Solely As Trustee For Structured Asset Mortgage Investments II Inc. Bear Stearns Mortgage  
3 Funding Trust 2007-ARI, Mortgage Pass-Through Certificates, Series 2007-AR1 ("Wells Fargo"),  
4 and Defendant Commonwealth Land Title Insurance Company, ("Commonwealth"), by and  
5 through their counsel of record, hereby stipulate as follows:

6 **WHEREAS**, Wells Fargo filed its Complaint in this matter on March 16, 2018 (ECF No.  
7 1);

8 **WHEREAS**, Commonwealth was served with the Summons and Complaint on or about  
9 March 29, 2018;

10 **WHEREAS**, Commonwealth's response to the Complaint is due on April 19, 2018;

11 **WHEREAS**, counsel for Commonwealth was only recently retained and requires additional  
12 time to respond to the Complaint;

13 **WHEREAS**, this is the first stipulation for an extension of Commonwealth's time to  
14 respond to the Complaint; and

15 **WHEREAS**, Wells Fargo has agreed to extend Commonwealth's time to respond to the  
16 Complaint to May 7, 2018,

17 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate  
18 and agree as follows:

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1 1. Commonwealth shall file its response to the Complaint in this matter on or before May  
2 7, 2018.

3  
4 Dated this 16<sup>th</sup> day of April 2018

5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP

7 By: /s/ Kevin S. Sinclair  
8 Kevin S. Sinclair  
9 Nevada Bar No. 12216  
601 South Seventh Street, 2<sup>nd</sup> Floor  
Las Vegas, Nevada 89101

10 Attorneys for Defendant  
11 Commonwealth Land Title Insurance Company

12 Dated this 16<sup>th</sup> day of April 2018

13 WRIGHT, FINLAY & ZAK, LLP

14 By: /s/ Matthew S. Carter  
15 Matthew S. Carter, Esq.  
16 Nevada Bar No. 9524  
7785 W. Sahara Ave., Suite  
Las Vegas, NV 89117  
17 Attorneys for Plaintiff  
Wells Fargo Bank, N.A. Successor By Merger to  
18 Wells Fargo Bank Minnesota, N.A., Solely As  
Trustee For Structured Asset Mortgage  
19 Investments II Inc. Bear Stearns Mortgage Funding  
Trust 2007-AR1, Mortgage Pass-Through Certificates,  
20 Series 2007-AR1

21 **ORDER**

22 **IT IS SO ORDERED:**

23 By: Peggy A. Leen  
24 PEGGY A. LEEN  
25 UNITED STATES MAGISTRATE JUDGE

26 Dated: April 19, 2018

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Matthew S. Carter, Esq.  
Wright, Finlay & Zak, LLP  
7785 W. Sahara Ave., Suite  
Las Vegas, NV 89117

*/s/--Kevin S. Sinclair*

KEVIN S. SINCLAIR